

EXHIBIT B

Excerpted For Length

From: Nicholas Inns <nicholasinns@quinnmanuel.com>
Sent: Thursday, July 3, 2025 2:58 PM
To: Bender, Kristin; Kevin A. Fritz; Glover, Joel; Theresa Troupson; Ellyn Garofalo
Cc: Christina Puello; Stephanie Roeser; Babcock, Chip; Bryan Freedman; Miles Cooley; Jason Sunshine; Mitch Schuster; Stacey Ashby; Amit Shertzer; mitra@ahouraianlaw.com; Cortni Davis; Vaneta Birtha; Jose Perez; Summer Benson; Gottlieb, Michael; Governski, Meryl Conant; Nathan, Aaron E.; Matthew Bruno; Connolly, Michaela; Esra Hudson; Katelyn Climaco; Taustine, Melissa; Kristin Tahler; Maaren Shah
Subject: RE: Lively v. Wayfarer

*** EXTERNAL EMAIL ***

Dear counsel,

Jonesworks and Ms. Jones agree to and join in the request for the extension of the schedule as stated below in both of the related cases, *Lively v. Wayfarer Studios* and *Jones v. Abel*.

Best regards,

Nicholas Inns

Associate,

Quinn Emanuel Urquhart & Sullivan, LLP

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Subject: RE: Lively v. Wayfarer

[EXTERNAL EMAIL from kbender@willkie.com]

All,

Further to the below, we wish to modestly extend the dates suggested in connection with our earlier proposal. Therefore, we propose the following:

1. Extend the close of fact discovery from August 14, 2025 to September 30, 2025, to run concurrently with the expert discovery schedule;
2. Completion of party document productions for issued RFPs by July 25;
3. Enter a shared briefing schedule on parties' motions to compel in connection with party document discovery:
Opening on August 1
Responses on August 8

We believe this proposal is appropriate for the reasons earlier explained. Please provide the parties' positions as to the above by 5 pm est today, as we intend to file a motion to request this relief today (as generally discussed yesterday on our teleconference).

Additionally, please be aware that we are rescheduling the Street 30(b)(6) deposition. Counsel for Ms. Case and Ms. Koslow have indicated a necessary delay in their productions currently ordered by the Court to be made on July 7. As we indicated to the Court last week, we need these documents to proceed with the Street deposition on July 9. Given that we will not have those documents, and also currently do not have the Street and Wallace party productions or certain relevant documents in the Nathan/TAG/Abel productions, we do not have the documents needed to conduct the deposition yet. We will keep all apprised of scheduling.

Best,
KB

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Subject: RE: Lively v. Wayfarer

Hi Kevin,

Please see my explanation immediately below, which addresses this. We're happy to discuss further tomorrow as needed.

Thanks,
Kristin

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Subject: RE: Lively v. Wayfarer

*** EXTERNAL EMAIL ***

Thanks Kristin. I've circulated a link. With respect to Ms. Slate's production, my understanding is that the link that you provided us on June 12 only included Ms. Slate's written responses and objections, and not the responsive documents that she provided your office. Please let me know if that is incorrect.



Kevin A. Fritz

Partner

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Cc: Christina Puello <cpuello@lftcllp.com>; Stephanie Roeser <SROeser@manatt.com>; Babcock, Chip <cbabcock@jw.com>; Bryan Freedman <bfreedman@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Mitch Schuster <ms@msf-law.com>; Stacey Ashby <sma@msf-law.com>; Amit Shertzer <as@msf-law.com>; mitra@ahouraianlaw.com; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Summer Benson <sbenson@lftcllp.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Matthew Bruno <MBruno@manatt.com>; Connolly, Michaela <MConnolly@willkie.com>; Esra Hudson <EHudson@manatt.com>; Katelyn Climaco <KClimaco@manatt.com>; Taustine, Melissa <MTaustine@willkie.com>; kristintahler@quinnemanuel.com; nicholasinns@quinnemanuel.com

Subject: RE: Lively v. Wayfarer

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Thanks, Kevin.

We are available tomorrow at 1 pm est. Please send an invite or advise if you would like us to.

Additionally, the Wayfarer Parties have received all third party productions that Ms. Lively has received, and on a timely basis. Please identify in advance of our meeting which delays in the provision of third-party productions you purport to be referencing. If you are referring to Ms. Slate's production, I presume you are aware that the production link was initially provided promptly on June 12, and it was re-provided with the full production and accounting for any technical errors within one business day of the Wayfarer Parties bringing it to our attention for the first time on June 20.

Best,
Kristin

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Subject: RE: Lively v. Wayfarer

*** EXTERNAL EMAIL ***

Kristin:

The Wayfarer Parties' position is that the parties should comply with the Case Management Plan and Scheduling Order. We are preparing to depose Blake Lively on July 17, 2025, a date to which you agreed after requesting an adjournment of her deposition originally scheduled for June 23, 2025.

With respect to your objection to TAG's confidentiality designation, we are available to meet and confer on July 2 from 11am EST to 2pm EST. During the call, we'd like to also discuss the timing for providing the other party/side with documents received from non-parties pursuant to subpoenas. We are concerned and have been made aware that there has been a delay between when your firm has received responsive documents from a non-party and when such documents were shared with us.



Kevin A. Fritz

Partner

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Subject: RE: Lively v. Wayfarer

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All,

Counsel for Street Relations and Mr. Wallace and counsel for Jonesworks have indicated that they agree to the proposal below. Will counsel for the other Wayfarer Parties please provide their position today?

Additionally, will counsel for the Wayfarer Parties please indicate whether they agree to de-designate TAG's second supplemental responses to Ms. Lively's interrogatories dated June 25, 2025, as non-confidential? If not, please provide availability to meet and confer as to the same.

Thanks,
KB

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Subject: Re: Lively v. Wayfarer

*** EXTERNAL EMAIL ***

Without waiving any argument in our motion to dismiss, agreed for Street and Mr. Wallace. Thanks for following up.

Best,

Joel

Joel Glover | Partner
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Subject: RE: Lively v. Wayfarer

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Counsel,

Please provide your positions on the below proposal so that we are able to move forward with clarity in ascertaining and scheduling available dates for depositions.

Thanks,
Kristin

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Subject: RE: Lively v. Wayfarer

All,

We write to address the upcoming deposition schedule, which is currently slated to conclude upon the close of fact discovery on August 14, 2025. As described below, we propose that the parties jointly approach the Court with a modification to the current case management plan to: (a) seek an extension to the close of fact discovery to September 18, 2025, (b) agree to a date by which parties will complete document production, and (c) enter a mutual briefing schedule for resolution of motions to compel on party document discovery.

Ms. Lively proposes the following:

- Extend the close of fact discovery from August 14, 2025 to September 18, 2025, to run concurrently with the expert discovery schedule
- Completion of party document productions for issued RFPs by July 15
- Enter a shared briefing schedule on parties' motions to compel in connection with party document discovery:
 - Opening: Monday, July 22
 - Responses: Friday, July 29

We believe this proposal addresses concerns that are likely shared by all parties regarding how the current fact discovery schedule fails to account for the current status of party and third-party document discovery. In particular, while the parties have made mutual assurances as to satisfying the July 1 substantial completion deadline, the parties are likely to make lesser, additional productions thereafter. There is also a likelihood that the parties will need to resolve written/document discovery disputes in the weeks that follow July 1. These disputes ideally should be resolved in advance of the bulk of party depositions, and if they are not, the likelihood of depositions being held open increases exponentially. The same holds true for third party discovery—there is third party discovery still to be made which, if unresolved when depositions begin, may necessitate holding open or pushing depositions until late into the current August schedule.

We have attempted to assemble a schedule whereby depositions close by August 14 and have found that it would be extremely challenging to map out what that will look like on a reasonable calendar. We believe that the above proposal will accommodate the parties' shared interests in progressing fact discovery in light of the challenges that the current discovery and anticipated briefing schedule pose. We expect that the Court would be amenable to the proposed schedule if collectively proposed, particularly given that it would not delay any other case schedule dates.

We are happy to further address this proposal on our scheduled conference this afternoon, and will be also prepared to discuss deposition schedule with the current August 14 discovery close as needed.

Regards,
KB

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Sent: Tuesday, June 24, 2025 9:02 PM

To: Bender, Kristin <KBender@willkie.com>; Local KAF. Counsel <kaf@msf-law.com>; Ellyn Garofalo <egarofalo@lftcllp.com>
Cc: Christina Puello <cpuello@lftcllp.com>; Stephanie Roeser <SROeser@manatt.com>; Chip Babcock <cbabcock@jw.com>; Joel Glover <jglover@jw.com>; Bryan Freedman <bfreedman@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Local MS. Counsel <ms@msf-law.com>; Stacey Ashby <sma@msf-law.com>; Amit Shertzer <as@msf-law.com>; mitra@ahouraianlaw.com; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Summer Benson <sbenson@lftcllp.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Matthew Bruno <MBruno@manatt.com>; Connolly, Michaela <MConnolly@willkie.com>; Esra Hudson <EHUDSON@manatt.com>; Katelyn Climaco <KClimaco@manatt.com>; Taustine, Melissa <MTaustine@willkie.com>
Subject: RE: Lively v. Wayfarer

*** EXTERNAL EMAIL ***

Counsel, in advance of tomorrow's call, we can offer the following deposition dates:

Jamey Heath: July 28 or 29

Justin Baldoni: July 30 or 31

Please advise which date you prefer for each deponent.

Regards,

Theresa M Troupson
Partner
LINER FREEDMAN TAITELMAN + COOLEY LLP
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From: Bender, Kristin <KBender@willkie.com>
Sent: Tuesday, June 24, 2025 4:28 PM
To: Local KAF. Counsel <kaf@msf-law.com>; Ellyn Garofalo <egarofalo@lftcllp.com>
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Subject: Re: Lively v. Wayfarer